

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**IN RE: LIBOR-BASED FINANCIAL  
INSTRUMENTS ANTITRUST LITIGATION**

**MDL No. 2262**

**No. 11 Civ. 5450 (NRB) (THK)**

**THIS DOCUMENT RELATES TO:  
ALL ACTIONS**

**DECLARATION OF RALPH J. BUNCHE IN SUPPORT OF  
RESPONSE OF PLAINTIFF MAYOR AND CITY COUNCIL OF BALTIMORE  
TO THE COURT'S ORDER OF OCTOBER 18, 2011**

I, Ralph J. Bunche, declare pursuant to 28 U.S.C. § 1746, as follows:

1. I am an attorney licensed to practice before this Court and am an associate at the law firm of Hausfeld LLP, counsel to Plaintiff Mayor and City Council of Baltimore.

2. In order to aid the Court's deliberation on the leadership applications in this matter and mindful that the Court was concerned that "the record is unclear as to whether plaintiffs supporting the Grant & Eisenhofer proposal are over-the-counter or exchange-based purchasers," October 18, 2011 Memorandum and Order (Doc. 32) at 7 (emphasis added), I attach as Exhibit 1 to this declaration a true and correct copy of a chart detailing the law firms representing class plaintiffs in this action, the claims asserted by their clients, and statements made about their clients' purchases in documents filed before the Court.

3. In response to statements made by the Grant & Eisenhofer Group that their firms "have undertaken extensive international discovery against foreign defendants, including from their London offices", Grant & Eisenhofer Group Leadership App. Reply (Doc. 18) at 4 (emphasis added), I reviewed the law firms' websites for references to London offices and

searched the database maintained by the Law Society of England and Wales, available at <http://www.lawsociety.org.uk/choosingandusing/findasolicitor.law>, listing all registered solicitors and foreign lawyers in that jurisdiction, and could find no indication of any offices maintained by those firms in that jurisdiction.

4. Exhibit 5 to the Palaniappan Declaration (Doc. 19-5) states “that Robbins Geller maintains offices in London at Co-Op Bank Building, 6th Floor, 9 Prescott Street, London E1 8AZ, United Kingdom.” I performed an internet search of that address and determined that that location was occupied by Pensions Investment Research Consultants Ltd (“PIRC”), a research consultancy providing advisory services to institutional investors. *See* <http://www.pirc.co.uk/contact>. On October 28, 2011 I called PIRC at that address and was informed that Robbins Geller Rudman & Dowd LLP’s U.S. attorneys use those offices when they are in London and that they do not have attorneys or solicitors at those offices permanently or at this time.

5. I attach as Exhibit 2 to this declaration a .pdf printout taken by me on October 28, 2011 of a page from the website of Grant & Eisenhofer P.A., available at <http://www.gelaw.com/contact.htm>, indicating office locations of that firm.


6. I attach as Exhibit 3 to this declaration a .pdf printout taken by me on October 28, 2011 of a page from the website of Robbins Geller Rudman & Dowd LLP, available at <http://www.rgrdlaw.com/offices.html>, indicating office locations of that firm.

7. I attach as Exhibit 4 to this declaration a .pdf printout taken by me on October 28, 2011 of a page from the website of Kirby McInerny LLP, available at <http://www.kmllp.com/contact.asp>, indicating office locations of that firm.

8. I attach as Exhibit 5 to this declaration .pdf printout taken by me on October 28, 2011 of a page from the website of Lovell Stewart Halebian Jacobson LLP, available at <http://www.lshllp.com/Contactus.aspx>, indicating office locations of that firm.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 28, 2011

  
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Ralph J. Bunche